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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 4:24-366 YGR
)	
Plaintiff,)	STIPULATION FOR CONTINUANCE AND
)	MOTION SCHEDULE; PROPOSED ORDER
v.)	
)	
KORY KINGSLEY,)	
)	
Defendant.)	

On March 5, 2025, the Court set a schedule for the Defendant's motion to suppress. ECF 39. Pursuant to the schedule, counsel for Mr. Kingsley filed a motion to suppress on April 8, 2025. Since the motion was filed the parties have continued discussions regarding potential resolution of the case. In light of these discussions, the parties stipulate and request to continue the schedule on the motion to suppress. The parties propose the following continuance:

- Government response: June 3, 2025
- Defense reply: June 18, 2025
- Hearing on motion to suppress: June 26, 2025

The Court previously set a preliminary hearing on the motion for May 1, 2025. ECF 39. The parties do not request a preliminary hearing, but if a preliminary hearing or status on the motion would

1 assist the Court, the parties respectfully request a special setting the week of June 9th or June 16th. The
2 parties are both unavailable on June 12, 2025.

3 Accordingly, the parties STIPULATE and agree that this matter should be CONTINUED until
4 the motion to suppress hearing date. The parties STIPULATE and agree that excluding time until that
5 date is appropriate due to delay resulting from a pretrial motion and is warranted for the effective
6 preparation of counsel. *See* 18 U.S.C. § 3161(h)(1)(C), (h)(7)(B)(iv). The parties further stipulate and
7 agree that the ends of justice served by excluding the time from May 29, 2025, through June 26, 2025,
8 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant
9 in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

10
11 DATED: April 25, 2025

Respectfully submitted,

PATRICK D. ROBBINS
Acting United States Attorney

14 /s/
MAYA KARWANDE
Assistant United States Attorney

16
17 DATED: April 25, 2025

Respectfully submitted,

JODI LINKER
Federal Public Defender

21 /s/
ELISSE LAROUCHE
Assistant Federal Public Defender

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from May 29, 2025 through June 26, 2025 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). Delay is also warranted based on delay resulting from a pretrial motion. *See* 18 U.S.C. § 3161(h)(1)(C). The Court further finds that the ends of justice served by excluding the time from May 29, 2025 through June 26, 2025 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, it is hereby

ORDERED that the time from May 29, 2025 through June 26, 2025 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

ORDERED that this matter be continued to June 26, 2025 at **2:00 PM** for a HEARING ON MOTION TO SUPPRESS.

ORDERED that the parties will follow the schedule below for the motion to suppress.

- Government response: June 3, 2025
- Defense reply: June 18, 2025
- Hearing on motion to suppress: June 26, 2025

Dated: April 28, 2025


HON. YVONNE GONZALEZ ROGERS
United States District Judge